

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

ALBERTELLI LAW

By: Roger Fay, Esq., ID No. 60002014

14000 Commerce Parkway, Suite H

Mount Laurel, NJ 08054

(856) 724-1888

File No. 230875-5

Attorneys for Movant: Legacy Mortgage Asset Trust
2021-GS1

In Re:

Joseph A. Coliskey

Case No.: 16-18777-MBK
Chapter 13

Hearing Date: September 27, 2023
Time: 9:00 a.m.

Judge: Michael B. Kaplan

RESPONSE TO MOTION TO DETERMINE MORTGAGE FEES AND EXPENSES

I, Roger Fay, in response to the Debtor's motion, states as follows:

1. I am the attorney for the secured creditor, Legacy Mortgage Asset Trust 2021-GS1 (hereinafter "Secured Creditor"), in the above referenced matter, the holder of a first mortgage on the property.

2. Secured Creditor has requested a ledger from the Trustee and is awaiting same. A full reconciliation of payments cannot be completed at this time without the ledger.

3. Secured Creditor requested consent to adjourn matter from Debtor's counsel to allow time for the research. Debtor's counsel has not responded.

Albertelli Law

Attorney for Secured Creditor

Dated: September 21, 2023

BY: /s/ Roger Fay

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CERTIFICATION OF SERVICE

1. I, Roger Fay, Esquire:

☒ represent the Secured Creditor in the above-captioned matter.

☐ am the secretary/paralegal for _____, who represents the
_____ in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On September 21, 2023, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

Response To Motion To Determine Mortgage Fees and Expenses

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

DATED: September 21, 2023

/s/ Roger Fay

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
George E Veitengruber, III Veitengruber Law LLC 1720 Highway 34 Suite 10 Wall, NJ 07727	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)
Joseph A. Coliskey 73 West Shenendoah Road Howell, NJ 07731		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.